

SEP 13 1995

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866  
1995 SEP 15 AM 10:41

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SEP 12 1995

EXPRESS MAIL  
RETURN RECEIPT REQUESTED

Dr. Alan F. Weston  
Manager - Analytical Services  
Special Environmental Programs  
Occidental Chemical Corporation  
Occidental Chemical Center  
360 Rainbow Boulevard, South  
Niagara Falls, New York 14302

Re: Groundwater Investigations Beyond the Ruco Property, Addendum  
No. 1

Dear Mr. Weston:

The U.S. Environmental Protection Agency (EPA) has reviewed Occidental Chemical Corporation's (OCC) response to EPA's comments on the Interim Report - Groundwater Investigations Beyond the Ruco Property, Addendum No. 1, dated August, 1995 concerning groundwater investigations currently being conducted beyond the Ruco property. After discussions with OCC and NYSDEC, OCC's Addendum No. 1 has been determined to be acceptable under the following conditions:

- 1 - Hydropunch samples shall be collected and analyzed according to the approved protocols in the Work Plan for Ground-Water Investigations Beyond the Ruco Property, August 1994 as approved by EPA in correspondence to Mr. Alan F. Weston dated September 23, 1994 for well clusters MW-56 and MW-57. These well clusters are part of the investigation beyond the Ruco property to determine the nature and extent of groundwater contamination. The only change to this protocol is that the depth of hydropunch sampling and monitoring well installation may be modified to reflect the depths of the municipal wells.
- 2 - Additional wells shall be installed at MW-56 and MW-57 in the event that the predetermined screen zones proposed by Occidental do not correspond to the zones of greatest contamination.

Based on the results of hydropunch sampling in borings MW-50, MW-53, MW-54 and MW-55, borings and hydropunch sampling at locations MW-51 and MW-52 may terminate at 400' below grade. All other borings, hydropunch sampling, well installation and well

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development at these locations shall be conducted according to the approved Work Plan for Groundwater Investigations Beyond the Ruco Property, August 1994 as approved by the EPA in correspondence to Mr. Alan Weston dated September 23, 1994.

OCC shall also provide copies of the Work Plan for Groundwater Investigations Beyond the Ruco Property, Addendum No. 1, August 1995, as amended by the comments 1 and 2 above, to members of the Technical Committee. Sharing this information and future data will facilitate the development of a comprehensive regional groundwater characterization.

Pursuant to the Administrative Order on Consent, Index No. II CERCLA-80216, OCC shall begin the work specified in the Addendum No. 1, as amended by the comments 1 and 2 above, immediately upon receipt of this letter and provide EPA a minimum of 5 days notice before commencement of the field activities.

If you have any questions regarding this information, please contact the Project Manager, Dale J. Carpenter at (212) 637-4277.

Sincerely yours,



Carole Petersen, Chief  
New York/Caribbean Superfund Branch II

cc: D. Drazan - EPA  
C. Stein - EPA, RCRA ✓  
B. Wing - EPA, Federal Facilities  
K. Gupta - NYSDEC - Albany  
J. Barnes - NYSDEC - Albany  
K. Subburamu - Ebasco